

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

COPY

STEPHANIE LYNN FORD  
PLAINTIFF,

CIVIL ACTION  
NO. 06-301(MPT)

JURY TRIAL

V.

CHRISTIANA CARE HEALTH  
SYSTEMS, RICHARD BURTON  
AND CLARA CLARK  
DEFENDENTS,

FILED  
CLARK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2007 JUN 27 AM 9:57  
PG

PLAINTIFF'S MOTION FOR EXTENSION  
OF DISCOVERY CUT-OFF DEADLINE, AND  
ATTEMPT TO OBTAIN THE NECESSARY  
DOCUMENTS FROM CHRISTIANA CARE HEALTH  
SYSTEMS, RICHARD BURTON AND CLARA.

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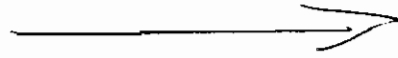
6 pages

I STEPHANIE LYNN FORD HAVE  
 MADE MANY ATTEMPTS TO OBTAIN  
 THE NECESSARY following listed  
 DOCUMENTS FROM THE DEFENDANTS,  
 CHRISTIANA CARE HEALTH SYSTEM,  
 RICHARD BURTON, AND CLARA CLARK.

QUESTIONS: JUDGE MARY PAT THYNGE:

WHY WAS THE MOTION TO COMPELL DENIED,  
 THAT I HAD RECENTLY FILED WITH  
 THE COURT. WHEN, IN FACT, YOUR HONOR,  
 YOU SPECIFICALLY INSTRUCTED ME  
 PER OUR LAST PHONE CONVERSATION,  
 THAT I HAD 3 DAYS TO <sup>RE-</sup>FILE THE  
 MOTION TO COMPELL INTO THE COURT,  
 (WHICH I DID FILED THE MOTION TO  
 COMPELL WITH THE COURT NUMEROUS TIMES)  
 ALONG WITH <sup>you</sup> DEFINING WHAT A MOTION

(2)



COMPELL CONSIST OF,

I ASK THIS HONORABLE COURT TO GRANT PLAINTIFF'S MOTION FOR EXTENSION OF DISCOVERY CUT-OFF DEADLINE TO OBTAIN THE FOLLOWING LISTED DOCUMENTS.

DOCUMENT #1 PLEASE PRODUCE A COPY FROM THE ORIGINAL OF ALL PLAINTIFF'S PENSION BENEFITS,

DOCUMENT #2 PLEASE PRODUCE A COPY FROM THE ORIGINAL COPY OF ALL PLAINTIFF'S RETIREE BENEFITS.

DOCUMENT #3 PLEASE PRODUCE ALL INFORMATION PERTAINING TO THE PLAINTIFF'S \$75,000 LIFE INSURANCE POLICY, ALONG WITH A COPY OF THE ACCURAL LIFE INSURANCE POLICY.

DOCUMENT #4 PLEASE PRODUCE A COPY FROM THE ORIGINAL COPY OF ALL PLAINTIFF'S LONG TERM DISABILITY BENEFITS.

DOCUMENT #5 PLEASE PRODUCE A COPY FROM THE ORIGINAL COPY OF ALL PLAINTIFF'S PERSONAL ACCIDENT INSURANCE.

DOCUMENT #6 PLEASE PRODUCE A COPY FROM THE ORIGINAL COPY OF ALL PLAINTIFF'S DENTAL INSURANCE COVERAGE.

DOCUMENT #7

PLEASE PRODUCE THE REASON THE PLAINTIFF WAS DENIED 29 JOBS AT CHRISTINA CARE HEALTH SYSTEMS.

SINCERELY,

Stephanie L. Ford  
6/27/07

QUESTIONS : JUDGE MARY PAT THYNGE:

- YOUR HONOR, DO YOU HAVE A COPY OF THE \$ 75,000 LIFE INSURANCE POLICY OR ANY OF THE LISTED DOCUMENTS.
- HOW ARE YOU ABLE TO RULE ON ANY OF THESE MOTIONS, WITHOUT HAVING THESE DOCUMENTS IN YOUR PRESENTS.

# CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES

THAT COPIES OF THE FOREGOING

WERE CAUSED TO BE SERVED THIS

27, JUNE 2007 UPON THE

FOLLOWING IN THE MANNER INDICATED

U.S. REGULAR MAIL

DAVID H. WILLIAMS

MORRIS JAMES, LLP,

500 DELAWARE AVENUE, SUITE  
1500

P. O. BOX 2306

WILMINGTON, DELAWARE  
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